

ELECTRONIC SERVICE - Ito v. Sam's Club Paulding County State Court CAN 23-SV-000094 - Supplement to  
From: Anne Rogers  
Sent: Monday, January 22, 2024 10:48 AM  
To: 'Matthew Momtahan'; Jennie E. Rogers  
Cc: 'Jessica Momtahan'; Stephanie@MomtahanLaw.com; brianna@momtahanlaw.com  
Subject: RE: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding  
County State Court  
CAN: 23-SV-000094 - Supplement to Plaintiff's Discovery Responses

Received and downloaded; thanks so much!

Anne Rogers  
Paralegal to Jennie E. Rogers  
McLain & Merritt, P.C.  
3445 Peachtree Road, NE, Suite 500  
Atlanta, Georgia 30326

From: Matthew Momtahan <matthew@momtahanlaw.com>  
Sent: Monday, January 22, 2024 9:51 AM  
To: Anne Rogers <arogers@mmatlilaw.com>; Jennie E. Rogers <jrogers@mmatlilaw.com>  
Cc: 'Jessica Momtahan' <jessica@momtahanlaw.com>; Stephanie@MomtahanLaw.com;  
brianna@momtahanlaw.com  
Subject: RE: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding County  
State Court CAN: 23-  
SV-000094 - Supplement to Plaintiff's Discovery Responses

Good morning,

Try this one:  
<https://www.dropbox.com/scl/fo/mrytcfzjfn9thinkgx00i/h?rlkey=0mrhsc2l134ifl1w5o172nran&dl=0>

Please let me know if it doesn't work.

Thank you.

Regards,

Matthew Momtahan  
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office\*\*\*

Disclosures & Disclaimers:

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debt. Accordingly, we may be attempting to collect a debt and any information  
obtained  
will be used for that purpose.

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the  
recipients as identified in the "To," "Cc," and "Bcc" lines of this email. This

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From: Anne Rogers <arogers@mmatl1aw.com>  
Sent: Monday, January 22, 2024 8:34 AM  
To: 'Matthew Momtahan' <matthew@momtahanlaw.com>; Jennie E. Rogers <jrogers@mmatl1aw.com>  
Cc: Jessica Momtahan <jessica@momtahanlaw.com>; Stephanie@MomtahanLaw.com; brianna@momtahanlaw.com  
Subject: RE: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding County State Court CAN: 23-SV-000094 - Supplement to Plaintiff's Discovery Responses

Good morning,

Unfortunately the link seems like it isn't working; could you please resend?

Thank you,

ELECTRONIC SERVICE - Ito v. Sam's Club Paulding County State Court CAN 23-SV-000094 - Supplement to Anne

Anne Rogers  
Paralegal to Jennie E. Rogers  
McLain & Merritt, P.C.  
3445 Peachtree Road, NE, Suite 500  
Atlanta, Georgia 30326

From: Matthew Momtahan <matthew@momtahanlaw.com>  
Sent: Friday, January 19, 2024 1:49 PM  
To: Jennie E. Rogers <jrogers@mmatlallaw.com>; Anne Rogers <arogers@mmatlallaw.com>  
Cc: Jessica Momtahan <jessica@momtahanlaw.com>; Stephanie@MomtahanLaw.com;  
brianna@momtahanlaw.com  
Subject: STATUTORY ELECTRONIC SERVICE - Ito v. Sam's Club, Paulding County State Court CAN: 23-SV-000094 - Supplement to Plaintiff's Discovery Responses

Jennie,

As I emailed back in December, we have been having issues collecting all of Ms. Ito's medical records and bills.

We finally believe that we received everything. Our supplementation can be download from here:  
<https://www.dropbox.com/scl/fo/mrytcfzjfn9thinkgx00i/h?rlkey=7g6r2fmsxwak66rzrxxzfl59n&dl=0>.

Unfortunately, there may be some duplicates in this production of bills and records that were previously produced back in July.

Please do not hesitate to contact me if you have any questions.

Thank you.

Regards,

Matthew Momtahan  
\*\*\*Please remember to REPLY ALL when replying to any and all emails from our office\*\*\*

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**Carolyn Ito - Special Damages Itemization - Date of Loss - 12/05/2021**

<b>Total Expenses</b>		
Wellstar Health System	ER Visit, CT Scan, X-ray	\$8,472.00
The Bortolazzo Group, LLC	ED Visit	\$1,400.00
Integrated Healthcare Center of Hiram	Office Visit, X-ray, Therapy Visit	\$9,010.00
Elite Radiology of Georgia, LLC	MRI	\$1,950.00
Medici Medical Arts, LLC	Office Visit, Injection, Anesthesia	\$20,320.98
Medici Surgical Center COBB, LLC	Surgical Procedures	\$23,734.90
Benchmark Physical Therapy-Powder Springs	Physical Therapy, Therapy Visit	\$8,410.50
<b>Total</b>		<b>\$73,298.38</b>

<b>Wellstar Health System</b>		
12/05/2021	ER Visit, CT Scan, X-ray	\$8,472.00
<b>Total</b>		<b>\$8,472.00</b>

<b>The Bortolazzo Group, LLC</b>		
12/05/2021	Emergency Department Visit	\$1,400.00
<b>Total</b>		<b>\$1,400.00</b>

<b>Integrated Healthcare Center of Hiram</b>		
12/15/2021-03/07/2022	Office Visit, X-ray, Therapy Visit	\$9,010.00
<b>Total</b>		<b>\$9,010.00</b>

<b>Elite Radiology of Georgia, LLC</b>		
01/30/2022	MRI of Cervical Spine	\$1,950.00
<b>Total</b>		<b>\$1,950.00</b>

<b>Medici Medical Arts, LLC</b>		
03/25/2022	Office Visit	\$881.60
04/04/2022	Office Visit	\$603.44
04/12/2022	Introduction/Injection of Anesthetic Agent	\$1,555.12
04/12/2022	Introduction/Injection of Anesthetic Agent	\$774.00
04/25/2022	Office Visit	\$603.44
05/24/2022	Office Visit	\$603.44
06/08/2022	Office Visit	\$603.44
07/18/2022	Office Visit	\$603.44
08/30/2022	Office Visit	\$603.44
09/26/2022	Office Visit	\$603.44
10/05/2022	Introduction/Injection of Anesthetic Agent	\$1,555.12
10/05/2022	Introduction/Injection of Anesthetic Agent	\$774.00
10/05/2022	Introduction/Injection of Anesthetic Agent	\$779.76
10/17/2022	Office Visit	\$603.44
11/14/2022	Office Visit	\$366.56
01/04/2023	Office Visit	\$603.44
01/26/2023	Office Visit	\$603.44
03/29/2023	Office Visit	\$603.44
05/02/2023	Office Visit	\$603.44
05/10/2023	Lumbar-Sacral Orthosis	\$1,821.54
06/12/2023	Office Visit	\$603.44
06/14/2023	Introduction/Injection of Anesthetic Agent	\$1,856.72
06/14/2023	Introduction/Injection of Anesthetic Agent	\$804.96
06/14/2023	Anesthesia	\$100.00
06/19/2023	Office Visit	\$603.44
08/02/2023	Office Visit	\$603.44

<b>Total</b>		<b>\$20,320.98</b>
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<b>Medici Surgical Center COBB, LLC</b>		
04/12/2022	Medial Branch Block/Facet, Cervical/Thoracic	\$3,390.70
04/12/2022	Medical Branch Block/Facet 2nd Cervical/Thoracic	\$3,390.70
10/05/2022	Introduction/Injection of Anesthetic Agent	\$3,390.70
10/05/2022	Introduction/Injection of Anesthetic Agent	\$3,390.70
10/05/2022	Introduction/Injection of Anesthetic Agent	\$3,390.70
06/14/2023	Introduction/Injection of Anesthetic Agent	\$3,390.70
06/14/2023	Introduction/Injection of Anesthetic Agent	\$3,390.70
<b>Total</b>		<b>\$23,734.90</b>

<b>Benchmark Physical Therapy-Powder Springs</b>		
12/14/2022-05/16/2023	Physical Therapy, Therapy Visit	\$8,410.50
<b>Total</b>		<b>\$8,410.50</b>